

PAUL S. PADDA, ESQ. (NV Bar #10417)
Email: psp@paulpaddalaw.com
PAUL PADDA LAW, PLLC
4560 South Decatur Boulevard, Suite 300
Las Vegas, Nevada 89103
Tele: (702) 366-1888

Attorney for Plaintiff

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

TAMARA SPEAKS,

Plaintiff,

vs.

EMPLOYERS HOLDINGS INC., DOES I
THROUGH X, INCLUSIVE, AND ROE,

Defendant.

Case No. 2:23-cv-0068-GMN-BNW

**STIPULATION TO PERMIT
PLAINTIFF ADDITIONAL TIME TO
RESPOND TO MOTION TO DISMISS**

[SECOND REQUEST]

Pursuant to Federal Rule of Civil Procedure 6(b)(1) and the Court's Local Rule of Civil Practice 7-2, Plaintiff and Defendant Employers Holdings, Inc., by and through their respective counsel, hereby stipulate and agree to permit Plaintiff an additional 3-business days, or until March 22, 2023, to file a response to Defendants' Motion to Dismiss (ECF No. 10). Presently, Plaintiff's response to the dispositive motion is due today. This is the parties' second request for an extension of time for the purpose set forth herein. The parties respectfully request the Court approve this stipulation. In support of this request, the parties rely upon the facts set forth below.

The parties agree that good cause exists to support this request for a short extension of time. Counsel for Plaintiff has explained to counsel for Defendant that he has been diligently working on a response to Defendant's dispositive motion but has unfortunately not been able to complete it due to other competing work commitments. For example, during the past week, undersigned counsel for Plaintiff was required to travel outside Las Vegas for a business matter. Additionally, during the past week, undersigned counsel for Plaintiff was required to prepare for and attend the deposition of an expert witness and work on an appellate brief. A short extension of 3-business days should provide undersigned counsel sufficient time to complete a response to the pending dispositive motion.

The parties respectfully request that the Court approve this Stipulation.

Respectfully submitted,

/s/ Joshua A. Sliker

/s/ Paul S. Padda

 Joshua A. Sliker, Esq.
 Katlyn M. Brady, Esq.
Counsel for Defendant Employers Holdings, Inc.

 Paul S. Padda, Esq.
Counsel for Plaintiff

Dated: March 17, 2023

Dated: March 17, 2023

IT IS SO ORDERED:



UNITED STATES DISTRICT JUDGE

DATED: March 17, 2023